

GOODWIN PROCTER

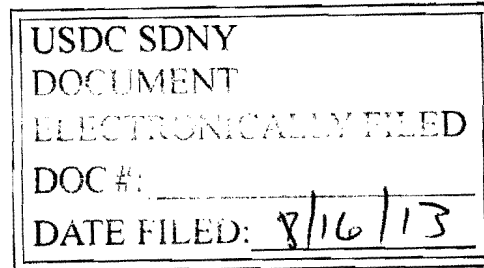
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August 14, 2013

BY FACSIMILE TO (212) 805-7986

Honorable Paul G. Gardephe
United States District Judge for the
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007



Re: *United States v. Mathew Martoma*, No. 12 Cr. 973 (PGG)

Dear Judge Gardephe:

Defendant Mathew Martoma, through Counsel, respectfully submits this letter requesting a temporary modification of his terms of release to allow him to travel for a vacation with his family to Mount Rushmore, including stops in Denver, Colorado and Pennington County, South Dakota.

By way of background, Mr. Martoma has been released on a personal recognizance bond of \$5 million, secured by \$2 million cash and/or real property. In addition, Mr. Martoma was ordered to surrender his passport, as well as those of his minor children, and travel was restricted to the Southern District of New York, Eastern District of New York, Florida (all districts), and the districts of Massachusetts and New Jersey.

The defense requests that the Court modify Mr. Martoma's conditions of release to permit him to travel on August 30, 2013 from Florida to Denver, Colorado by air, then by automobile from Denver to Pennington County, South Dakota to visit Mount Rushmore, returning to Florida by air on or before September 8, 2013.

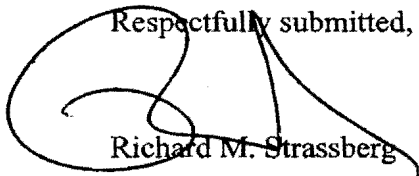
We have spoken to pre-trial services officer David Sutherland and Assistant U.S. Attorneys Arlo Devlin-Brown and Eugene Ingoglia, who consent to this request.

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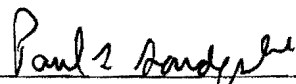
Accordingly, we request that Mr. Martoma's conditional release be modified to permit travel to the Districts of Colorado, Wyoming, Nebraska, and South Dakota from August 30 to September 8, 2013.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard M. Strassberg", is written over the closing text.

cc: Arlo Devlin-Brown, AUSA
Eugene Ingoglia, AUSA

SO ORDERED this 16th day of August
2013

A handwritten signature in black ink, appearing to read "Paul G. Gardephe", is written above a horizontal line.

Honorable Paul G. Gardephe
United States District Judge